

The Hon. Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

| No. CR17-191-RSL

Plaintiff,

**MOTION FOR ENTRY
OF A PRELIMINARY
ORDER OF FORFEITURE**

LOUIS ONG,

NOTE ON MOTION CALENDAR:

Defendant.

May 4, 2018

The United States, by and through its undersigned counsel, moves pursuant to Federal Rule of Criminal Procedure (“Fed. R. Crim. P.”) 32.2(b) for entry of a Preliminary Order of Forfeiture forfeiting, to the United States, the Defendant Louis Ong’s interest in the following property:

1. Approximately 24.3 Bitcoin seized from the Defendant's Mycelium Address wallet, on or about July 21, 2017;
 2. Approximately 50.4210216 Bitcoin seized from the Defendant's Breadwallet wallet, on or about August 3, 2017;
 3. Approximately 50.42 Bitcoin Cash seized from the Defendant's Breadwallet wallet on February 16, 2018;

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- 2 4. \$11,970 in U.S. currency seized from the Defendant's rental vehicle, *i.e.*, a
- 3 white 2017 Ford F-150 Super Crew Cab truck, on or about July 27, 2017;
- 4 5. \$11,000 in U.S. currency seized from the Defendant's safe deposit box, *i.e.*,
5 Box #294 located at Wells Fargo in Ferndale, Washington, on or about July
6 28, 2017;
- 7 6. \$12,580 in U.S. currency seized from Express Mail parcel
8 EL513437218US on or about April 11, 2017; and,
- 9 7. \$200,000 in U.S. currency seized from the Defendant at the time of his
10 arrest on July 21, 2017.

11 This motion is based on the following procedural facts, which are reflected in the
12 pleadings filed in this matter.

13 On February 15, 2018, the Defendant entered a guilty plea to Operating an
14 Unlicensed Money Transmission Business, in violation of 18 U.S.C. §§ 1960(a) &
15 (b)(1)(A) (Dkt. No. 36). In his plea agreement, the Defendant agreed to forfeit his interest
16 in the above-identified property pursuant to 18 U.S.C. § 982(a)(1) as it constitutes
17 proceeds of, and/or was involved in, the offense (Dkt. No. 36, ¶ 5).

18 To comply with the timing requirements of Fed. R. Crim. P. 32.2(b)(2)(B), the

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1 United States now moves for entry of a Preliminary Order forfeiting the Defendant's
2 interest in this property. A proposed Order is submitted with this motion.

3 DATED this 23rd day of April, 2018.
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5 Respectfully submitted,
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7 ANNETTE L. HAYES
8 United States Attorney
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CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2018, I electronically filed the foregoing Motion with the Clerk of Court using the CM/ECF system, which automatically serves the parties of record.

Michelle Johnson

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